

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ASHLEY ADAMS	:	
716 North Barrett Lane	:	
Christiana, DE 19702	:	DISTRICT COURT
PLAINTIFF	:	
	:	
v.	:	No. 04-251 JJF
	:	
JO ELLEN CHAPEN SHELDON	:	
708 Pebble Beach Drive	:	
Elkton, MD 21921	:	
	:	TRIAL BY JURY DEMANDED
DEFENDANT	:	

NOTICE OF MOTION

TO: Kevin G. Healy, Esq.
Morris James Hitchens & Williams
16 Polly Drummond Hill Road
Newark, DE 19711

PLEASE take notice that the undersigned will present the
attached Response of Defendant to Kevin Healy's Motion to Withdraw
as Counsel at a date and time convenient to the Court.

/S/Beth H. Christman
BETH H. CHRISTMAN, ESQ.
I.D. No. 2107
Casarino, Christman & Shalk, P.A.
800 N. King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899
(302) 594-4500
Attorney for Defendant

DATE: February 1, 2006

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**RESPONSE OF DEFENDANT TO MOTION OF KEVIN HEALY
TO WITHDRAW AS COUNSEL**

Comes now, Beth H. Christman and Casarino, Christman & Shalk, P.A., to provide this Honorable Court with a response to the motion for withdrawal as counsel for Ashley T. Adams, based upon the following:

1. The defendant does not object to the withdrawal of Kevin G. Healy, Esq. as attorney for plaintiff.

2. Defendant does request that this motion be heard in front of the Court with plaintiff, Ashley T. Adams, present so that plaintiff can advise the Court as to whether she will be obtaining alternative counsel or representing herself.

3. Defendant further respectfully requests that if plaintiff is going to represent herself, dates are set for completion of discovery and trial so that this matter is not delayed further.

Respectfully submitted,

/S/Beth H. Christman
BETH H. CHRISTMAN, ESQ.
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ORDER

Respondent's Motion in Response to Kevin Healy's Motion to
Withdraw as Counsel having been presented,

IT IS SO ORDERED this _____ day of _____, 2006, that
Kevin Healy's Motion to Withdraw as Counsel is granted and that if
plaintiff is going to represent herself, dates are set for
completion of discovery and trial as follows:

completion of discovery: _____

TRIAL: _____

, J.

CERTIFICATE OF SERVICE

I, BETH H. CHRISTMAN, hereby certify that I have served by U.S. District Court e-file on this 1st day of February, 2006, true and correct copies of the attached document, addressed to:

Kevin G. Healy, Esq.
Morris James Hitchens & Williams
16 Polly Drummond Hill Road
Newark, DE 19711

/s/Beth H. Christman
BETH H. CHRISTMAN, ESQ.
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